

VEGWARE AUSTRALIA PTY LTD

SUPPLIER CODE OF CONDUCT

Vegware Australia Pty Ltd (Vegware Australia) Supplier Code of Conduct (Code) outlines expectations of Suppliers that supply goods and services to Vegware Australia. It places a positive duty on Suppliers to take proactive action to prevent unacceptable or unlawful conduct, as outlined in this Code and in accordance with Australian Government and International regulations.

It is essential that Suppliers share our values and standards, and act in accordance with this Code. Vegware Australia has adopted systems and processes to assess and ensure Supplier's compliance with this Code, including seeking written confirmation from Suppliers of their acceptance and compliance of this Code.

This Code incorporates our Modern Slavery Policy Statement, Whistleblower Policy and Corporate Social Responsibility Policy. Noting, these existing policies can be found at the end of this document.

'Supplier' for the purpose of this Code is defined as a person or business that provides a product or service to another entity. Suppliers are a crucial part of any business. They source items at a suitable price for businesses with the right materials, products and/or services to conduct a business. Suppliers don't only supply businesses with products and other physical supplies, they may also supply services such as, but not limited to: banking and financial services; accounting services; freight services; utility services; property suppliers; IT/internet and phone services; marketing services; and insurance products.

The principles outlined in this Code apply to all Suppliers, including their employees and subcontractors, transacting with, or providing any goods and services to, Vegware Australia throughout the supply chain.

Vegware Australia expects its Suppliers to conduct themselves with high standards of ethics such that they consistently act with integrity and accountability. Ethics is considered to encompass, at a minimum: honesty, integrity, probity, diligence, and fairness. Ethical behaviour also extends to not making improper use of an individual's position or benefiting from practices which may be dishonest, unethical, or unsafe. This should be demonstrated through Suppliers' behaviour and actions and supported by appropriate governance arrangements.

Where requested by Vegware Australia, Suppliers must be able to demonstrate they have appropriate policies, frameworks, or similar, in place regarding ethics, governance and accountability to comply with these expectations. Failure to adhere to this Code may result in remedial action and/or discontinuation of the Supplier's goods and services to Vegware Australia.

LABOUR & HUMAN RIGHTS:

Vegware Australia cares about people, respects human rights, and is committed to building a culture where diversity is valued. We strive for our workplaces to be free from discrimination, harassment, and bullying, and we comply with applicable laws and international standards such as the Universal Declaration of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. Vegware Australia will only work with Suppliers who share these values.

EXPECTATIONS:

Vegware Australia expects Suppliers to:

- Ensure all work is freely chosen without the use of modern slavery, including forced or compulsory labour;
- Ensure workers are of legal age, preventing any form of child labour;
- Ensure bullying, harassment and discrimination, whether physical, sexual, psychological or verbal, are not tolerated within their organisation;
- Pay their workers lawful wages, including equal pay for equal work;
- Provide fair working conditions for their employees, including adequate rest periods, sufficient leave, freedom of association and collective bargaining in accordance with relevant local laws;
- Promote an inclusive workplace that respects differences in, including but not limited to, gender, age, race, national, ethnic or social origin, disability, family status, political views, religion, sexual orientation, or carers' responsibilities; and
- Allow and respect union affiliation within the appropriate national or applicable frameworks.

Ethical Business Practices:

Vegware Australia understands that complying with all applicable laws and regulations in the locations where we operate is an essential requirement for success.

Our approach is to pursue the highest standards of ethical, transparent and responsible conduct in all our business dealings.

We demand similar standards from our Suppliers and expect them to:

- Act at all times with integrity, transparency and honesty;
- Have a zero tolerance for bribery and corruption;
- Declare any actual or potential conflicts of interest in dealings with Vegware Australia;
- Ensure any gifts and hospitality offered or received are reasonable, appropriate, not overly frequent, and for legitimate business purposes only;
- Comply with applicable local, state, federal, international laws and regulations (including but not limited to sanctions, anti-money laundering, market conduct and tax) in all locations where they operate and interact with Vegware Australia;

We demand similar standards from our Suppliers and expect them to (continued):

- Comply with all relevant competition laws, enter into transactions for genuine economic reasons, and promote fair behaviour towards other businesses and consumers;
- Comply with data privacy and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared; and
- Respect Vegware Australia's confidential information and not disclose this, except as required by law or where authorised in writing by Vegware Australia.

HEALTH & SAFETY:

Workplace health and safety is of paramount importance to Vegware Australia. We strive to operate in a way that will not adversely affect the health and safety of our people and the public. Vegware Australia seeks to work with Suppliers who share similar values and have a documented set of policies and programs aimed at promoting a safe, healthy and secure workplace.

We expect Suppliers to:

- Comply with all relevant laws and regulations related to workplace health and safety;
- Implement written health and safety policies and standards;
- Develop and implement documented systems to identify and record work-related injuries and illnesses;
- Encourage the reporting of any unsafe conditions, equipment or work practices;
- Proactively establish programs or practices to improve the overall health and wellbeing of employees, such as reducing the frequency and severity of personal injuries; and
- Adhere to Vegware Australia's health and safety management systems and guidelines at Vegware Australia's premises.

SUSTAINABILITY:

Vegware Australia recognises that sustainability and acting responsibly will make our business more resilient and deliver long-term value for our people, the environment and the community. We aim to reduce the impact of our operations and that of the activities along the supply chain.

Suppliers are expected to:

- Comply with all relevant local and national laws and regulations on environmental management and reporting, and adhere to Vegware Australia's requirements;
- Be committed to protect the environment and continually work towards minimising waste, pollutions, emissions and the negative impact of their activities on the environment;
- Strive to reduce environmental impact through the efficient use of natural resources, energy, water and raw materials; and
- Support and contribute to the local communities in which they have presence and/or operations, and manage the social impact of their activities responsibly through continuous engagement and regular dialogue.

MANAGEMENT PRINCIPLES OF THIS CODE OF CONDUCT:

The principles outlined in this document are important to Vegware Australia. It is equally important that Suppliers recognise and are committed to these principles, or set similar standards within their organisations, as part of their ongoing relationship with Vegware Australia.

Vegware Australia will continue to adopt and apply systems and processes to assess and ensure Supplier's compliance with this Code, including seeking written confirmation from Suppliers of their acceptance and compliance. Vegware Australia may verify compliance with this Code through a variety of mechanisms which may include a self-evaluation tool for Suppliers or, if deemed necessary, a more comprehensive on-site assessment led by Vegware Australia or a nominated third party.

Vegware Australia may request Suppliers to submit documentary evidence to verify compliance.

If a Supplier finds it difficult to comply with the requirements in this Code, this should be reported and shared with a Vegware Australia representative. Vegware Australia aims to work with Suppliers to develop and implement corrective action plans where possible. However, serious breaches or continued non-compliance with this Code may lead to Vegware Australia ceasing a commercial relationship with such Suppliers.

The expectations outlined in this Code do not supersede or alter the Suppliers' legislative, policy, regulatory, or other contractual obligations.

Suppliers are advised that suspected activities that could constitute serious and systemic corrupt conduct will be notified to the National Anti-Corruption Commission (nacc.gov.au/reporting-and-investigating-corruption) as soon as reasonably practicable.

COMPLIANCE RAISING CONCERNS:

If there are any serious concerns about non-compliant behaviour, including but not limited to breaches of this Code, a Supplier may raise it with their Vegware Australia representative or via Vegware Australia at compliance@vegware.com.au or by phone at our Vegware Australia office on 1800 953 776.

Other **Key Contacts** that Vegware Australia and Suppliers may require, if deemed necessary, are:

- For anyone in immediate danger call the Police on 000
- If modern slavery practices are occurring onshore, contact the Australian Federal Police on 131 237 or email NOSSC-Client-Liaison@afp.gov.au
- In the case of practices occurring offshore, contact the ABF at slavery.consultations@abf.gov.au
- For more information about rights and responsibilities in the workplace contact the FairWork Ombudsman at www.fairwork.gov.au

Acknowledgements:

The Australian Government - Commonwealth Supplier Code of Conduct

Vegware Australia Existing Policies:

Vegware Australia Pty Ltd - MODERN SLAVERY POLICY STATEMENT

This policy reflects Vegware Australia's commitment to ensure to the best of our ability that there is no modern slavery in any part of our business operations. We are committed to acting ethically and with integrity in all business dealings and relationships, and where possible, to ensure modern slavery is not taking place in our own business or supply chain.

Our business also expects its service providers, suppliers and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or within its supply chain.

Definitions:

The term 'modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats and deception can be explicit or implicit.

The Modern Slavery Act 2018 (Cth) 'Act' defines modern slavery as including eight types of serious exploitation; trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

The worst forms of child labour means extreme forms of child labour that involve the serious exploitation of children, including through enslavement or exposure to dangerous work. The worst forms of child labour does not mean all child work.

Under Australian law, modern slavery is defined in the Act. In the event of any inconsistency, the definitions in the Act take precedence over this policy.

Key Contacts:

- For anyone in immediate danger call the Police on 000
- If modern slavery practices are occurring onshore, contact the Australian Federal Police on 131 237 or email NOSSC-Client-Liaison@afp.gov.au
- In the case of practices occurring offshore, contact the ABF at slavery.consultations@abf.gov.au
- For more information about rights and responsibilities in the workplace contact the FairWork Ombudsman at www.fairwork.gov.au

Vegware Australia Pty Ltd - WHISTLEBLOWER POLICY

This policy provides the principles and guidelines to support the Whistleblower processes at Vegware Australia Pty Ltd.

Overview

The purpose of this Policy is to encourage the reporting of corrupt, illegal or other undesirable conduct at Vegware Australia. It outlines how individuals can appropriately make disclosures about these matters and how Vegware Australia will protect those individuals from detrimental consequences.

Scope

This Policy applies to directors, employees, contractors and suppliers and service providers, and any other persons associated with Vegware Australia.

Guiding Principles

Vegware Australia strives to maintain a positive working environment of trust and respect where all voices can be heard. Fundamental to this is our commitment to protecting the rights of anyone who reports wrongdoing in good faith. We are committed to maintaining and promoting high standards of integrity, governance and ethical behaviour within the organisation by people at all levels. Vegware Australia is committed to complying:

- with the applicable laws and practices including the Corporations Act 2001 and Australian Standard AS8004 – 2003 Whistleblower Protection Program for Entities; and
- in accordance with its policies and procedures.

Whistleblower Definition

A Whistleblower is defined as anyone who makes a report under this Policy. Consistent with the provisions of the Whistleblower Laws, this will include current and former directors, employees, customers, contractors and suppliers (including employees of suppliers), and associates of Vegware Australia, as well as relatives, spouses and dependants of these individuals. It also includes any person that Vegware Australia decides to treat as a Whistleblower and protect as a result of making a report that doesn't fall within the scope of the Whistleblower Laws. In those circumstances the protections do not apply by reason of the Whistleblower Laws, but equivalent protections apply by reason of this Policy.

A Whistleblower is eligible for protection as an individual who brings a disclosable matter or concern to the attention of Vegware Australia under this Policy. Such disclosable matters or concerns are, but are not limited to:

- misconduct (including fraud, negligence, default, breach of trust and breach of duty), or an improper state of affairs or circumstances in relation to Vegware Australia
- an offence against, or contravention of the Corporations Act 2001 or the Australian Securities and Investments Commission Act 2001 (Cth)
- conduct that represents a danger to the community or the financial system of Vegware Australia.
- an offence against any other law of the Commonwealth that is punishable by imprisonment for 12 months or more.
- suspected or actual breaches of Vegware Australia's Code of Conduct, policies, procedures or values or any contravention of Human Rights.

A disclosable matter does not include a personal work grievance, which is covered in our Grievance Handling guidelines in Vegware Australia's Workplace Policy.

Vegware Australia Pty Ltd - WHISTLEBLOWER POLICY (continued)

Reporting a disclosable matter or concern

A report can be made by anyone in a way that is either attributed to the individual raising the matter or can be reported anonymously. If you consent to Vegware Australia looking into your attributed reporting or concern, and allowing us to disclose the concerns that you have raised, the following are the channels through which your concern can be reported.

Disclosures qualify for protection if they are made to eligible recipients. These include by reporting directly to eligible recipients of Vegware Australia's, such as the:

- Managing Director – paul@vegware.com.au
- Human Resources Manager – christine@vegware.com.au

In choosing to report through one of the above, you will have been deemed to have consented to attributed reporting, which may include disclosure of your name.

You can also choose to report directly to the Fair Work Commission or another agency designed to receive such report. If you wish to report your disclosable matter or concern to the Fair Work Commission, further information and a template is available on their website www.fwc.gov.au to help you provide relevant information.

You can also seek independent legal advice who can contact an agency on your behalf.

Non-Detriment

This Policy seeks to prevent and protect Whistleblowers from any detriment, which includes the following:

- dismissal of an employee
- injury of an employee in employment
- alteration of an employee's position or duties to his or her disadvantage
- discrimination between an employee and other employees of the same employer
- harassment or intimidation of a person
- harm or injury to a person, including psychological harm
- damage to a person's property
- damage to a person's reputation
- damage to a person's business or financial position
- any other damage to a person.

Whistleblower Investigation

Vegware Australia's eligible recipient will investigate the substance of the complaint to determine whether there is evidence in support of the matters raised or to refute the report. Vegware Australia will safeguard the interests of the Whistleblower in terms of this Policy and any applicable legislation and standards. We are committed to providing a safe, reliable and confidential way of reporting any disclosable matters or concerns. A report under this Policy can be made if eligible individuals fall into the above Whistleblower Definition.

Vegware Australia Pty Ltd - WHISTLEBLOWER POLICY (continued)

A report may be made verbally, including via telephone, in writing or via email to the eligible recipients. The report should include:

- the nature of the allegation and the individuals involved
- the key facts in providing evidence that a disclosable matter exists
- nature and whereabouts of any additional evidence that substantiates the allegations.

A person listed as an eligible recipient above can be skipped, at any stage, if that person is the subject of the report or if the Whistleblower has another reason to believe that the person is not likely to deal with the report properly. While reports can be made anonymously if preferred, this may affect the ability to investigate the matter properly and to communicate with the Whistleblower about the report.

The investigation processes will vary depending on the precise nature of the conduct being investigated. The purpose of the investigation is to determine whether or not concerns are substantiated, with a view to rectifying any wrongdoing uncovered to the extent that this is practicable in all the circumstances. The investigation will be thorough, objective, fair and independent of the Whistleblower and anyone who is the subject of the disclosable matter or concern. The investigation will also have proper regard to the principles set out in the Australian Standard AS8004-2003 on Whistleblower Protection Program for Entities. The Whistleblower will receive feedback regarding the investigation arising from their report, subject to considerations of the privacy of anyone who is the subject of the disclosable matter or concern and standard confidentiality requirements.

Vegware Australia - CORPORATE SOCIAL RESPONSIBILITY POLICY

This policy sets out Vegware Australia Pty Ltd's commitment to be a responsible member of the world community. Demonstrating our commitment to Corporate Social Responsibility (CSR) is a journey, during which we aim to align our business values, purpose, and strategy with the social and economic needs of our stakeholders, whilst embedding responsible and ethical business policies and practices into everything we do.

Purpose

The purpose of this policy is to outline the principles we follow and the projects we are committed to undertake with a view to supporting our Corporate Social Responsibility (CSR) ethos.

Scope

This policy applies to all employees, contractors, customers and suppliers.

Our principles

We aim to develop and implement a social ethos and environmental policies which fit in with our employees' everyday activities and responsibilities.

Vegware Australia Pty Ltd is committed to the following CSR principles:

- We are committed to respecting all local and internally recognised human rights.
- We manage our business with pride and integrity.
- We aim to provide a safe workplace with fulfilling and rewarding careers for all employees.
- We actively assess and manage the environmental impacts of our operations.
- We will continually benchmark and evaluate what we do in order to improve our CSR performance.

Honesty and Integrity

Real improvements can only be made by sharing resources, knowledge, and power. We communicate our environmental policies, objectives and performance openly and honestly with our employees and with stakeholders who have an interest in our activities, including customers, suppliers and contractors. We will encourage them to communicate with us and will seek their views.

Sustainable Progress

We are committed to continually improving our efficiency and performance. We will take into account technical developments, contemporary scientific evidence, costs, and customer concerns and expectations in the development and implementation of new policies and procedures. We will monitor our performance, set objectives for improvement, and regularly share our progress.

We abide by our Sustainability Pillars of:

Avoiding methane emissions

Food waste in landfill can emit methane, a powerful greenhouse gas. Compostable foodservice packaging can serve as a vehicle to help divert food scraps from landfill and capture it for organics recycling.

Soil health

Soil health is critical for food security, agriculture and human health. Nutrient-rich compost displaces petrochemical fertiliser, sequesters carbon, acts as a soil conditioner and local creates value in the circular economy. We will continue our mission to help drive the composting of our products.

Vegware Australia - CORPORATE SOCIAL RESPONSIBILITY POLICY (continued)

Responsible fibre

Felling trees without replanting contributes to climate change. Fibre-based materials can have an impact on agriculture. The fibre used in our products is from responsibly-managed forestry and annually-renewable crops such as bagasse, which is reclaimed waste sugarcane fibre. We will build on existing responsible fibre sourcing to demonstrate sustainable practices. We are taking advocacy positions on healthier soils, helping clients minimise contamination, and doing all we can to drive good quality organics recycling. We are currently working towards obtaining our FSC certification.

Procurement power

Packaging relies on raw materials, transport and energy. Every manufacturer has an opportunity to review and improve its climate impact measures, and drive more sustainable behaviours throughout logistics and supply chains. We are committed to using business as a force for positive change. We will engage with our supply chain on carbon management plans and other ways to be better global citizens.

Carbon management

Net zero means achieving a balance between the carbon an organisation is emitting and removing from the atmosphere. It is vital to reduce the carbon impact of all human activity to mitigate the climate emergency. We will continue to measure our impact, and create a carbon management plan which enables us to work towards Net Zero. We want to create positive outcomes for the environment, our employees, our customers and society as a whole. We will remain a Living Wage employer and build on our supportive human-centred policies. We will work towards B Corp certification to verify high standards of social and environmental performance, transparency and accountability.

Demonstrable Compliance

At a minimum, we will meet or exceed all relevant legislation. Where no legislation exists, we will seek to develop and implement our own appropriate standards.

Areas of Focus:

Human Rights Standards

We will abide by Australian laws requiring our business to comply with human rights standards. These laws include but are not limited to:

- Laws prohibiting discrimination and harassment in the workplace and laws requiring employers to provide equal employment opportunities.
- Laws regulating conditions of work, for example, workplace health and safety, terms and conditions of employment, minimum wage, collective bargaining, and prohibition of child labour and forced labour.
- Laws regarding Native Title.
- Laws imposing liability on corporations for certain acts which impact on human rights, such as bribery of foreign officials or complicity in war crimes or crimes against humanity.

Environment

We will take all reasonable steps to manage our operations to minimise our environmental impact and promote good environmental practice. We will regularly review our business practices and performance to identify how we can improve our energy efficiency, reduce water usage, and waste disposal. Currently all paper, cardboard, plastic and cans are segregated and recycled. All goods are disposed of in line with current legislation. We will commit to continual improvement of our environmental management practices to enhance environmental performance.

Vegware Australia - CORPORATE SOCIAL RESPONSIBILITY POLICY (continued)

Relationships

We will conduct our business relationships with integrity and courtesy and honour our trading commitments. Our aim is to build long-term relationships with our suppliers and contractors and, where appropriate, provide support for small, local, specialist contractors. We are committed to trading fairly with our suppliers and will communicate our responsible sourcing expectations to them in the areas of health, safety and worker welfare and good environmental practice.

Our relations with our contractors are well documented and benefit from a well-defined compliance / pre-qualification process. In addition to this, continuous communication is key to ensuring our common goals are met.

Indigenous / Community commitments

As a socially and responsible business, we have an obligation to support the communities that we operate in. We are honoured to be able to help put Aboriginal art into the hands of our community and to support the work they do by offering a range of products featuring Aboriginal artwork as a permanent fixture in our product range. We are committed to running competitions throughout each year to indigenous and non-indigenous budding artists to gain such artwork, with prize donations offered to the winning competitors, and provide a mutually agreed upon commitment to printing the artworks on our products throughout the year.

Employees

We will respect our employees and encourage their development and training. We will promote equality as differences in responsibilities permit and consider the interests of our employees including welfare, health, and safety. We aim to empower our employees and will recognise individual contributions and reward them fairly. Our ultimate aim is the wellbeing of all employees through worthwhile and satisfying employment in a successful business.

Employees contribute to our CSR by ensuring that:

- All materials that can be recycled are placed in available recycle bins.
- Printing of business documents, files and reports are kept to a minimum and are filed online.
- All computers and lights are turned off overnight.

Quantifying Success

Improvements in our quantitative CSR performance will be continually monitored against the above principles, which cover the major areas of CSR, such as the environment, community, workplace, and marketplace, and we will be committed to the continual improvement of our CSR performance.